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Washington Department of Ecology
Hazardous Waste & Toxics Reduction Program
Compliance Report

Site:	**Akzo Nobel Eka Chemicals**	**RCRA ID#: WAD988468286**
Inspection Date:	October 3, 2006	
Site Contacts:	Calvin Greene – Plant Manager	
Phone:	(509) 765-6400	
Site Location:	2701 RD N NE Moses Lake, WA 98837	
Mailing address:	Same	
At This Site Since:	1990	NAIC#: 3215131, 54171
Generator/Site Status:	LQG	

Ecology

Lead Contact:	Nicky Swanson, Hazardous Waste Specialist	Phone: (509) 457-7109 FAX: (509) 575-2809
Other Representatives:	Lori Rodriguez, Hazardous Waste Specialist	
Report Date:	October 11, 2006	
Report By:	Nicky Swanson	

Nicky Swanson (Signed) 11/8/06 (Date)

Facility Background:

Akzo Nobel Eka Chemicals (hereafter EKA), located on approximately 15 acres in the Wheeler Industrial Corridor of Moses Lake, Washington, is owned by AKZO Nobel, headquartered in the Netherlands. EKA manufactures sodium chlorate and alkyl-ketene dimer (AKD) emulsion. Sodium chlorate is shipped to chemical pulp mills where it is converted to chlorine dioxide and used as a preferred bleaching agent for the pulp industry. AKD is a sizing agent made from AKD wax, starch, and/or polymeric compounds. This product allows papermakers to make permanent alkaline paper with correct properties for aqueous penetration (inks, glues, etc.). It is used primarily in the production of packaging and printing/writing paper. EKA's Annual Dangerous Waste Report for 2005 reported the following pounds of dangerous waste were managed in 2005:

Waste Sodium Chlorate	12,250.00
Laboratory Waste, Liquids	3,600.00
Waste Methanol	1,033.00

EKA had previous dangerous waste compliance inspections in 2000 and in 1992. EKA responded to violations noted in a timely manner.

Inspection Summary:

This inspection was a planned, unannounced, routine dangerous waste compliance inspection including an opening conference, site tour, and an exit interview.

An opening conference was held with Calvin Greene, Plant Manager, and Diane Smith, SH&E Quality Assistant. Lind Bingham, SH&E Quality Manager, was out of town and joined us by teleconference. A general description of their waste streams and processes were discussed including the non-recurrent dangerous waste generated in 2006 from an unusable tank car of sodium chlorate solution. Uniform Hazardous Waste Manifests (2005-6) and inspection logs were reviewed. EKA uses one inspection log is for all of their accumulation areas. The log does not include the printed name of the inspector and the time of the inspection. Weekly inspection log entries are maintained.

Since Mr. Bingham maintains the majority of the documents relating to dangerous waste management, the remainder of the record review was postponed until his return.

The site tour consisted of the:

- Main Process Building and its two laboratories (Quality Assurance and Production),
- Maintenance Building,
- Satellite/used oil accumulation area behind the Maintenance Building,
- HVAC Room,
- Paper Chemicals Building, and
- Waste tote accumulation area and evaporation pit behind the Paper Chemicals Building.

Main Process Building

The main processing area generates the following wastes: brine sludge, lab waste (liquids and solids), filter sludge, spent filters, and spills to the floor.

EKA produces sodium chlorate in aboveground tanks inside this building. The floor is coated and sloped to a central trench collection system. Incidental spills and drips flow into the trench and then pumped into the buffer tank. Soda ash is added to the tank to remove (flocculate) calcium impurities. After filtering the sodium chlorate is returned to the process.

Sodium chlorate production consists of bringing salt and water together in a manufacturing process involving electrolysis of an acidified sodium chloride solution in a specially designed cell. To prepare the solution for reaction hydrochloric acid is added, to give the proper pH, and sodium dichromate is added to inhibit corrosion. Chlorate ions form at the anode while hydrogen gas leaves the cell at the cathode. Excess hydrogen gas is sold for energy use.

The final accumulation area for dangerous waste generated in the laboratories is a plastic, grated containment pallet located against the east wall of the building. Full 55-gallon drums of lab waste are moved onto the pallet, dated, and manifested off-site. No drums were present at the time of the inspection.

In the area directly outside the laboratories, the filter press is located about 6 feet above the floor. An open 55-gallon drum is located below the filter press collects sludge and liquid from the chute. This drum is not labeled. The filter press drips material contaminated with hex-chrome continuously onto the floor. The drips drain into the trench.

This area also contains a plastic-lined fiber tote on a pallet. The tote is covered, labeled as a "hazardous waste" and "oxidizer," and has an accumulation start date. This tote accumulates filter sludge, spent filters, and contaminated lab debris.

We observed a closed 5-gallon plastic container in each lab with a hazardous waste label affixed but without a risk label. These are the first satellite accumulation containers for chromium contaminated sulfuric and phosphoric acid.

A closed 55-gallon blue poly drum along the wall outside the labs is a second satellite accumulation drum for the acid lab waste. The drum is closed and has a hazardous waste label affixed. The drum is not marked with the major risk. Once this drum is full the waste is neutralized and transferred to the final accumulated pallet mentioned above.

In addition, each lab has a 30-gallon drum with a hazardous waste label but no risk label. These are satellite accumulation drums for chrome/sodium chlorate contaminated debris. When full, these drums are emptied into the filter sludge tote.

Maintenance Building

Don Sherify, Maintenance Supervisor, joined us for the Maintenance Building tour. The maintenance department generates waste from one Safety Kleen parts washer, sandblast media (every 2-3 years), used oil, waste M.E.K. solvent/paint, waste batteries, and spent fluorescent light bulbs.

Located directly outside the building are two plastic, grated containment pallets. Two full 55-gallon drums labeled as used oil were on the pallets. The drums lid did not have rings. An open unlabeled 5-gallon bucket of used oil was also on the pallets. The used oil was scheduled to be picked up in the next day or so.

A 30-gallon drum was observed inside a containment overpack directly adjacent to the pallets holding the used oil. The drum was being used as a satellite accumulation container for solvent/paint waste. The drum had 4-5 inches headspace and was securely closed and labeled with a hazardous waste label. However, the label was not readily visible without looking inside the overpack. According to Mr. Sherify this drum is emptied approximately every 2 years.

We then continued upstairs to the HVAC Room to observe the accumulated spent fluorescent light bulbs. Over twenty boxes of spent bulbs were stored in the HVAC Room. Some of the boxes were open and not labeled as Universal Waste Lamps or Used/Waste Lamps. The boxes were not marked with an accumulation start date to ensure they were accumulated < one year.

Paper Chemical Building

Pat Ealy, Paper Chemicals Unit Manager, joined us for the Paper Chemical Building tour. The paper chemical processes generate waste methanol, sump waste liquid, evaporation pit solids, off-spec products, spent filters, and floor trench wastewaters filtered and discharged under a waste water discharge permit issued by the City of Moses Lake.

According to Mr. Ealy waste methanol is generated in batches four times a year as part of a distillation process for one of their specialty products. No waste methanol was accumulating at the time of our inspection. We did observe the empty plastic, grated containment pallet which serves as the final accumulation area for waste methanol.

An evaporation pit behind the building was installed in June 2006 to evaporate sump water from the Paper Chemical Building. The pit consists of a low, three-sided, sloped concrete pad with a removable cover to control run-on. The resulting solids are put into an open roll-off box adjacent to the pit and managed as solid waste.

Approximately ten 300-gallon plastic totes containing a mixture of off-spec products and sump waste were also behind the building. These totes were scheduled to be picked up by LTI for transport to Arlington as non-dangerous waste the following day. Two additional totes of off-spec product that were not scheduled for disposal were labeled as Kemiron (1/2 full on-site > two years) and EKA CC3050. Mr. Ealy readily provided us MSDSs for the off-spec products. The Kemiron MSDS lists the pH range as 0.5-4.4. The EKA 3050 MSDS lists the ingredient as a 2% solution of sodium hydroxide and would appear to be a non-dangerous waste.

The following table outlines EKA's waste streams observed or discussed during this inspection:

EKA Chemical						
	Wastestream Location/Composition	**Frequency R/N**	**Designation**	**Mgmt.**	**Annual Amount (Gallons)**	**Notes**
1.	Brine Sludge	R	Non-hazardous	Not determined during inspection		
2.	Tank Car Liquid Sodium Chlorate	N	D001 D007	TSD – Deep Well Injection	17,000	Oxidizer
3.	Tank Car Solids Sodium Chlorate	N	D001 D007	TSD - Stabilization	300	Oxidizer
4.	Liquid Lab Waste (Sulfuric & Phosphoric Acid w/ Chrome)	R	D002 D007	TBG/Elem. Neut. then TSD	400	Improper S.A. No Risk Labels No TBG logs
5.	Solid Lab Waste (Sodium Chlorate Debris)	R	D007	Mixed W/ Item 7. Process Sludge		√Risk Labels

EKA Chemical						
	Wastestream Location/Composition	**Frequency R/N**	**Designation**	**Mgmt.**	**Annual Amount (Gallons)**	**Notes**
6	Filter Press Liquid	R	D007	Incidental processing - filter/floccul ate then reuse		Analogous process used for raw materials so this is not considered a solid waste per EPA's "Guidance for Identifying Incidental Processing Activities" dated October 2005
7	Process Sludge Sodium Chlorate	R	D007	TSD	Varies yearly, 12,000-40,000	
8	Used Oil	R	Non-hazardous			Not tightly sealed
9	Spent Solvent/Paint MEK	R	Pending		55 Gallons/2 years	SA has not been shipped off yet
10	Safety Kleen Parts Washer	R		CUP	30 gallons/ev ery 10 weeks	Bill of Lading states SQG Counting?
11	Sandblast Media Maint. Bldg.	R	Non-hazardous	Solid waste		No longer used
12	Universal Waste Batteries/Lamps	R	Universal Waste	Recycle		Need accumulation start date, labeling and proper containerizati on for all used lamps
13	Methanol	R	D001	TSD	Batch generated 2 or 3, 55-gallon drums/year	None on-site during inspection

EKA Chemical						
	Wastestream Location/Composition	**Frequency R/N**	**Designation**	**Mgmt.**	**Annual Amount (Gallons)**	**Notes**
14.	Evaporation Pond Solids	R	Non-hazardous	Solid Waste		Designation not verified during inspection
15.	Off-Spec. Kemiron MSDS pH=.5-4.4	N	Pending		150	
16.	Off-Spec. EKA CC350 MSDS 3050=2%NaOH	N	Pending		300	
17.	Waste Totes Sumpwater Off-Spec. Products›Profile 15734 and 15733	N	Non-hazardous	Chem. Waste Mgmt. Arlington	9570 and 2310 respectively	Designation reviewed and ok
18.	Trench Waste Liquid Paper Chemical Building	R	Non-hazardous	Discharged under wastewater permit		Designation not verified during inspection
19.	Filter Media from Paper Chemical Building	R				Designation not verified during inspections

Closing Conference/Records Review

During a brief closing conference with Calvin Greene we made arrangements to follow up with Lind Bingham upon his return on the remaining waste management/recordkeeping questions. Diane Smith provided copies of the facility's "Environmental Release Reporting," "Environmental Release Response," and the "Response to Chemical Cloud/Spill" Plans for later review.

On October 10 and 11, I sent e-mails to Lind Bingham requesting additional information necessary to complete the inspection. Mr. Bingham provided the additional information on October 12, 2006. Using this information, I conducted a complete review of EKA's general inspection plan, training plan, training records, and contingency plan in addition to reviewing their designation and treatment processes.

Although located among numerous EKA documents, it appears all contingency plan and general inspection components are present. According to Mr. Bingham, he is in the process of building an integrated Contingency Plan. This may help in consolidating information in the future.

The records submitted to fulfill the requirements for WAC 173-303-330, Personnel Training, were incomplete. The written training plan does not include the specific information required in section 2a

regarding job description, title, name of employee filling each job, requisite skills, and duties. The training records reviewed for three of the responders listed above do not include a yearly update of all of the components identified for Responder Training under the "On-Site Response" section of EKA's training plan.

Additional Information/Concerns

Filter Press Leaks - Leaks from the filter press containing hex-chrome drip onto the floor in a foot traffic area of the main plant. Employees are routinely being exposed to hex-chrome dripping from overhead, a slippery floor, and are tracking hex-chrome around the facility. I strongly encourage you to eliminate the overhead dripping and exposure of hex-chrome. This may be a worker safety issue under the authority of Washington State Department of Labor and Industries.

Safety Kleen's Continued Use Program (CUP) Solvent Management – EKA should be aware that Ecology does not agree with the SK application of the solid waste exemption to solvents in the CUP. Any company that uses the CUP does so at its own risk. It is the generator's responsibility to ensure that their waste is managed appropriately. Future actions by Ecology regarding the CUP may have implications for its users. A copy of an Ecology correspondence to SK explaining Ecology's position is enclosed to assist you in making decisions regarding CUP participation.

In addition, the Bills of Lading supplied by Safety Kleen list EKA's generator status incorrectly as a SQG.

Universal Waste Lamps

According to Mr. Lind, EKA is considering purchasing a bulb crushing device to assist with the management of spent fluorescent lamps. I indicated to Mr. Lind that Ecology had had concerns with various units marketed. Below is a summary of the issues regarding bulb-crushing activities.

The State of Washington did not apply to EPA to include lamp crushing in the universal waste program. Therefore, any lamps treated by crushing are fully regulated under Chapter 173-303 WAC. You must count the lamps once they enter the treatment unit.

Lamp crushing must comply with the treatment-by-generator (TBG) requirements of WAC 173-303-170(3)(b). Crushed lamps and spent filters designating as hazardous must be managed as HW. TBG activities are not allowed if it results in the release of hazardous materials to the environment. **Ecology will not allow lamp crushing activities until information demonstrating that mercury emissions are adequately controlled and resulting wastes are properly managed has been received and reviewed.**

Ecology has several concerns regarding the emission control effectiveness of the bulb crushing devices as described below:

- Replacement frequency for the carbon filter.

- The quality of the seal between the crushing unit and the drum appears to impact the effectiveness to control emissions *What operating and/or maintenance procedures are in place to monitor the effectiveness of the seal?*
- Mercury may be emitted after the bulbs are crushed. *What measures are in place to control mercury emissions when the unit is not in operation and when the drum or filters are being replaced?*

Ecology found the following documents on the internet regarding emissions from the unit marketed as the " Bulb Eater":

- Suzanne Davis, "Survey and Initial Evaluation of Small On-Site Fluorescent Lamp Crushers", April 2001.
- Ambient Group, Inc; 9/28/2000 Survey Data
- Minnesota Dept. of Health, Health Consultation Report, 12/1/2003

Data and discussions in these documents vary but overall indicate there is insufficient data to ensure emissions from the unit will meet worker safety standards under site specific conditions.

It is difficult obtain a representative sample of crushed lamps for analysis. Mercury concentrations are the highest at the bottom of the drum. A sample obtained from a single location in the drum is not representative. The material in the sample should be representative of the entire lamp. Obtaining a representative sample becomes even more difficult if more than one brand or type of bulb is crushed.

You can manage uncrushed lamps as universal waste. These lamps are not counted toward generator status. In Ecology's experience, the cost of disposing of crushed lamps exceeds the cost of managing lamps as universal waste. If this is the case, the only benefit of crushing lamps is volume reduction. Given the added concerns over potential worker exposure, EKA may want to evaluate whether or not on-site crushing is desired.

Compliance Problems

The following conditions identified during the inspection on **October 3, 2006** *were not in compliance with Dangerous Waste and/or other environmental laws. Each problem is covered in three parts. (1) the* ***citation from the regulations****, (2) the* ***specific observations*** *from the inspection that highlight the problem, and (3) the* ***corrective measures*** *needed to fix the problem and achieve compliance. On the last page(s) of this report is a 'Compliance Certificate' which again lists these compliance citations and directives in a table. That certificate also lists the deadlines for the corrective measures to be completed. These deadlines are Ecology's expectation of the time reasonably required to resolve violations. The deadlines do not relieve you of your continuing responsibility to comply with the regulations at all times. The certificate explains how to complete the form and return it to the Department of Ecology.*

1) **WAC 173-303-170(2) and by reference 200(2)(a): Dangerous waste collected in satellite accumulation areas must be managed in accordance with the regulations. Transferring waste from a full satellite container to a second satellite accumulation container is not allowed.**

Observations: Each lab has a 5-gallon satellite container of hazardous waste without a risk label.

The contents of these containers are transferred to a second satellite accumulation container, a 55-gallon blue poly drum, outside the lab. The drum is not marked with the major risk.

A 30-gallon satellite drum in each lab used to accumulate hazardous chrome/sodium chlorate contaminated debris does not have a risk label.

Required Actions: Within two days of receipt of this letter, comply with "satellite accumulation area" requirements by: (a) accumulating no more than 55 gallons of dangerous waste per waste stream at or near the point of generation; (b) when full, immediately mark container with the accumulation start date, or transfer waste to a storage container marked with the accumulation start date; (c) label container as "hazardous" or "dangerous waste" and in a manner which identifies the major risk(s) associated with the contents of the container.

2) WAC 173-303-170(3)(b): Generators that treat waste on-site in accumulation tanks, containers and containment buildings must either meet the TSD facility requirements, or maintain a log with the dates and amount of waste treated on-site and comply with the requirements of WAC 173-303-283(3) and the applicable requirements of -200, -201, and -202.

Observations: A log is not maintained for the elementary neutralization of the liquid lab waste.

Required Actions: Within 7 calendar days from receipt of this letter, create and maintain a log with the date and amount of waste treated on-site. Within 30 days, comply with WAC 173-303-200, -201, -202, and -283, or comply with the TSD facility requirements.

Treatment by Generator guidance for elementary neutralization is enclosed.

3) WAC 173-303-515(6)(a)(i): Containers of used oil must be kept closed except to add or remove used oil.

Observation: Directly outside the Maintenance Building, two 55-gallon drums labeled as used oil had lids without rings. A 5-gallon bucket of used oil was open.

Required Actions: Within two days of receipt of this letter, close all containers of used oil.

4) WAC 173-303-200(1)(b) and by reference 630(3); Container labels were unreadable.

Observations: The label on a 30-gallon satellite drum outside the Maintenance Building containing solvent/paint waste was not readily visible.

Required Actions: Within two days of receipt of this letter, ensure all labels are present and not obscured or otherwise unreadable for the purposes of inspection.

5) WAC 173-303-573(10): Universal wastes must be properly labeled or marked to identify the type of universal waste as required by this section.

Observations: Boxes of spent fluorescent bulbs in the HVAC Room were not labeled or marked as universal waste.

Required Actions: Within 2 calendar days of the receipt of this letter label or mark all of the universal waste lamps with the words "Universal Waste Lamp(s)," "Waste Lamp(s)," or "Used Lamp(s)."

6) WAC 173-303-573(11): Universal wastes may only be accumulated for up to one year, except as noted in 173-303-573(11)(b). Documentation must exist to demonstrate that the time limits have been met.

Observations: The accumulation date for boxes of spent fluorescent bulbs were in the HVAC Room was not documented.

Required Actions: Within 30 calendar days of the receipt of this letter show accumulation time limits have been met, using a demonstration as described in WAC 173-303-573(11)(c).

Universal Waste Rule for Lamps guidance is enclosed for more information.

7) WAC 173-303-200(1)(e) and by reference 330(2): A written dangerous waste training plan was inadequate.

Observations: The written training plan did not include the specific information required in section 2a regarding job description, title, name of employee filling each job, requisite skills, and duties.

Required Actions: Within 60 calendar days of the receipt of this letter, prepare and begin to maintain an adequate written training plan. Submit a copy of the plan to the department.

8) WAC 173-303-200(1)(e) and by reference 330(1): The facility owner or operator must provide a program of classroom training or on the job training.

Observations: The training records reviewed for the three responders did not include a yearly update of all of the components identified for Responder Training under the "On-Site Response" section of EKA's training plan.

Required Actions: Within 30 days, develop and institute a training program meeting the standards required in WAC 173-303-330(1) in regards to insuring the annual review of the required training.

9) WAC 173-303-200(1)(b) and by reference 630(6): Dangerous waste inspection log was inadequate.

Observations: EKA has the numerous hazardous waste accumulations areas. Only one inspection log is used for all of the accumulation areas; the log does not include the printed name of the inspector and the time of the inspection. EKA's "Hazardous Waste Inspection Checklist" does not include the requirement for a risk label under Satellite Accumulation.

Required Actions: Within 7 days of receipt of this letter, develop and maintain a separate inspection log for each hazardous waste accumulation area. The logs must include: date and time of inspection; name and signature of the inspector; a notation of the observations made; and the date and nature of any corrective measures taken for each accumulation area. Submit a copy of the proposed inspection log within 7 days of receipt of this letter.

COMPLIANCE CERTIFICATE

Instructions: **Return this Completed Form or Request an Extension** -- Use this form to report if the action(s) needed to achieve compliance, identified during the inspection on ***October 3, 2006,*** have been completed. Complete the shaded portion of the table and mail a copy of this form to ***Nicky Swanson*** by **January 8, 2007** at the following address: Washington Department of Ecology, Hazardous Waste and Toxics Reduction Program, Attention: ***Nicky Swanson, 15 West Yakima Avenue, Suite 200, Yakima WA. 98902-3452.***

An extension of the deadlines to achieve compliance may be requested. Please make a request in writing, including the reasons an extension is necessary and proposed date(s) for completion, and send it to ***Nicky Swanson*** before the date specified above. Ecology will provide a written approval or denial of your request.

If you have any questions about information in this Compliance Report, please call:
Nicky Swanson at (509) 457-7109

The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations. Please indicate the date each action is completed and initial each item. Include any comments explaining the actions taken on a separate piece of paper.

Compliance Problems	Compliance Deadlines	Date Completed	Initials
1) **WAC 173-303-170(2) and by reference 200(2)(a): Dangerous waste collected in satellite accumulation areas must be managed in accordance with the regulations. Transferring waste from a full satellite container to a second satellite accumulation container is not allowed.** Required Actions: Within two days of receipt of this letter, comply with "satellite accumulation area" requirements by: (a) accumulating no more than 55 gallons of dangerous waste per waste stream at or near the point of generation; (b) when full, immediately mark container with the accumulation start date, or transfer waste to a storage container marked with the accumulation start date; (c) label container as "hazardous" or "dangerous waste" and in a manner which identifies the major risk(s) associated with the contents of the container.	**Within 2 days**		

2) WAC 173-303-170(3)(b): Generators that treat waste on-site in accumulation tanks, containers and containment buildings must either meet the TSD facility requirements, or maintain a log with the dates and amount of waste treated on-site and comply with the requirements of WAC 173-303-283(3) and the applicable requirements of -200, -201, and -202. Required Actions: Within 7 calendar days from receipt of this letter, create and maintain a log with the date and amount of waste treated on-site. Within 30 days, comply with WAC 173-303-200, -201, -202, and -283, or comply with the TSD facility requirements.	**Within 7 days**		
3) WAC 173-303-515(6)(a)(i): Containers of used oil must be kept closed except to add or remove used oil. Required Actions: Within two days of receipt of this letter, close all containers of used oil.	**Within 2 days**		
4) WAC 173-303-200(1)(b) and by reference 630(3): Container labels were unreadable. Required Actions: Within two days of receipt of this letter, ensure all labels are present and not obscured or otherwise unreadable for the purposes of inspection.	**Within 2 days**		
5) WAC 173-303-573(10): Universal wastes must be properly labeled or marked to identify the type of universal waste as required by this section. Required Actions: Within 2 calendar days of the receipt of this letter label or mark all of the universal waste lamps with the words "Universal Waste Lamp(s)", "Waste Lamp(s)", or "Used Lamp(s)".	**Within 2 days**		
6) WAC 173-303-573(11): Universal wastes may only be accumulated for up to one year, except as noted in 173-303-573(11)(b). Documentation must exist to demonstrate that the time limits have been met. Required Actions: Within 30 calendar days of the	**Within 30**		

receipt of this letter show accumulation time limits have been met, using a demonstration as described in WAC 173-303-573(11)(c).	**days**		
7) WAC 173-303-200(1)(e) and by reference 330(2): A written dangerous waste training plan was inadequate. Required Actions: Within 60 calendar days of the receipt of this letter, prepare and begin to maintain an adequate written training plan. Submit a copy of the plan to the department.	**Within 60 days**		
8) WAC 173-303-200(1)(e) and by reference 330(1): The facility owner or operator must provide a program of classroom training or on the job training. Required Actions: Within 30 days, develop and institute a training program meeting the standards required in WAC 173-303-330(1) in regards to insuring the annual review of the required training.	**Within 30 days**		
9) WAC 173-303-200(1)(b) and by reference 630(6): Dangerous waste inspection log was inadequate. Required Actions: Within 7 days of receipt of this letter, develop and maintain a separate inspection log for each hazardous waste accumulation area. The logs must include: date and time of inspection; name and signature of the inspector; a notation of the observations made; and the date and nature of any corrective measures taken for each accumulation area. Submit a copy of the proposed inspection log within 7 days of receipt of this letter.	**Within 7 days**		